REMARKS/ARGUMENTS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-36 are pending; no claims are newly added, amended, or canceled herewith.

In the outstanding Office Action, Claims 1-7, 12-14, 17-29, and 31-36 were rejected under 35 U.S.C. § 102(e) as anticipated by Sampson et al. (U.S. Pat. No. 6,490,624, hereafter Sampson; and Claims 8-11, 15, 16, and 30 were rejected under 35 U.S.C. § 103(a) as unpatentable over Sampson in view of Ferguson et al. (U.S. Pat. No. 5,819,092, hereafter Ferguson). For the reasons discussed below, these rejections are respectfully traversed.

Claim 1 recites, in part:

> a second server system configured to carry out communications with the first server system and the client systems and to provide the electronic services as a partner site of the main site ... the second server system having:
>
> a second server authentication processing unit configured to carry out authentication with the first server system, at a time of receiving the remote updating;
>
> a tie-up page unit configured to maintain the tie-up pages related to a partnership between the main site and the partner site; and
>
> an original page unit configured to maintain original pages of the partner site.

Independent Claims 18, 25, and 33-36 recite analogous features.

By way of clarification, as previously explained by the Applicant, a "session" does not correspond to a "page." Generally, a "page" in the server means a web page or a home page, and a "session" is a logical connection state in communication. See, e.g., Sampson, col. 2, lines 35-37, which states that "these interactions generally occur during one or more HTTP sessions that are established between the client and the server."

Nonetheless, the outstanding Office Action states at page 2, that:

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> Applicant applies his/her own lexicographer (*sic*) to specifically define a term "tie-up pages" of a claim contrary to its ordinary meaning. Examiner, as best understood, (*sic*) the definition of the "tie-up pages" from written description of pages is updated or maintenance of html pages.

However, the Office Action fails to cite to any specific portions of the specification to support either the assertion that Applicant's definition is contrary to the ordinary meaning of "tie-up pages" or the definition applied by the Office Action. In fact, the Office Action does not cite to any authority to support its definition of "tie-up pages" or to support the assertion that the Applicant's definition is improper.

Rather, the Applicant's definition of "tie-up pages" is consistent with both the specification and the description in <u>Sampson</u>. Accordingly, it is respectfully submitted that the definition of "tie-up pages" as set forth by the Applicant is not contrary to its ordinary meaning, as alleged by the outstanding Office Action.

Additionally, it is unclear from the outstanding Office Action which elements in <u>Sampson</u> are being equated to the first server system and the second server system of the claimed invention. The cited portions of <u>Sampson</u> that allegedly teach the first server system of the claimed invention describe an access server, a protected server, a registry server, and a registry repository. The outstanding Office Action has not equated any particular one of these individual elements to the claimed first server system.

As best can be determined by the Applicant, the outstanding Office Action equates the session manager of <u>Sampson</u> with the second claimed server system. As noted above, the claimed second server system includes a second server authentication processing unit configured to carry out authentication with the first server system, at a time of receiving the remote updating. While <u>Sampson</u> describes an authentication mechanism 422, there is no description in <u>Sampson</u> as to what the authentication mechanism 422 authenticates. Accordingly, <u>Sampson</u> cannot teach the claimed second server system.

The outstanding Office Action further alleges that the tie-up page unit in the second server system of the claimed invention is disclosed in col. 8, lines 5-12, and col. 16, lines 41-43 of Sampson. However, the cited portions of Sampson describe a registry repository, which is a relational database management system. There is no disclosure or suggestion about tie-up pages related to a partnership between the main site and the partner site, even when applying the improper definition of tie-up pages applied by the outstanding Office Action.

Accordingly, it is respectfully submitted that Sampson fails to disclose or suggest the features of Claim 1. Likewise, it is respectfully submitted that Sampson fails to disclose or suggest the analogous features recited independent Claims 18, 25, and 33-36. Therefore, it is respectfully requested that the outstanding rejection of Claims 1-7, 12-14, 17-29, and 31-36 be withdrawn.

It is also respectfully requested that the outstanding rejection of Claims 8-11, 15, 16, and 30 under 35 U.S.C. § 103(a) is unpatentable over Sampson in view of Ferguson also be withdrawn, because Ferguson is not relied upon to provide the features identified as deficient in Sampson.[1] As a result, the outstanding Office Action has failed to provide a *prima facie* case of obviousness with respect to Claims 8-11, 15, 16, and 30, and withdrawal of this rejection is respectfully requested.

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[1] Because Ferguson is not relied upon to provide the features identified as deficient in Sampson, Ferguson is not substantively addressed herewith.

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Consequently, in view of the foregoing discussion, it is respectfully submitted that

this application is in condition for allowance. An early and favorable action is therefore

respectfully requested.

Respectfully submitted,

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